

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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| IN RE: SANDRA ANN MCKINLEY, | : CHAPTER 13 |
| DBA SANDRA MCKINLEY ANTIQUES,: | |
| Debtor | : |
| | : |
| JACK N. ZAHAROPOULOS, | : |
| STANDING CHAPTER 13 TRUSTEE, | : CASE NO. 1:24-bk-01935-HWV |
| Movant | : |
| | : |
| vs. | : |
| | : |
| SANDRA ANN MCKINLEY, | : |
| DBA SANDRA MCKINLEY ANTIQUES,: | |
| Respondent | : |

TRUSTEE'S OBJECTION TO THIRD AMENDED CHAPTER 13 PLAN

AND NOW, this 20th day of February, 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtor's Plan for the following reason:

1. The Debtor's Plan violates 11 U.S.C. §1325(b)(1) in that the Plan does not provide for the payment of all of the Debtor's projected disposable income for a minimum period of five (5) years. The Plan incorrectly states that the Debtor is under median. The Debtor is over-median with a Means Test minimum payment of \$39,774.00.
2. The Trustee avers that the Debtor's Plan is not feasible based upon the following:
 - a. The Plan is underfunded relative to claims to be paid. The Plan does not pay the liquidation value, plus payments on secured claims.
 - b. The Plan is ambiguous as to the base amount.

WHEREFORE, the Trustee alleges and avers that the Debtor's Plan cannot be confirmed, and therefore, the Trustee prays that this Honorable Court will:

- a. deny confirmation of the Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos,
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 20th day of February, 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Kara K. Gendron, Esquire
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101

/s/Derek M. Stroupbauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee